

Finnigan Complaint Vicinity Map

Parcel Location

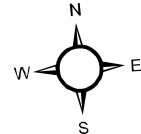
Proclaimed Forest Boundary

National Forest System Land

Other Land Inside Forest Boundary

Township

Section



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**ATTORNEY FOR DEFENDANT**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**MISSOULA DIVISION**

<b>ESTATE OF GLOWDENA B. FINNIGAN,</b>  <b>Plaintiff,</b>  <b>vs.</b>  <b>UNITED STATES OF AMERICA,</b>  <b>Defendant.</b>	<b>CV 18-109-M-DLC-JCL</b>     <b><u>Declaration of Will Pedde</u></b>
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Pursuant to 28 U.S.C. § 1746, I Will Pedde, declare as follows:

1. I am the Regional Land Status Program Manager for Region One of the U.S. Forest Service. As the Land Status Program Manager I am responsible for maintaining and interpreting land ownership title files, and managing the Region's Land Status Records System (LSRS), which is cadastral Geographic Information System (GIS) database. I oversee the creation of all spatial and tabular data entered into the LSRS. I have held this position since March, 2018, and I have worked in Region One Land Status department since November, 1999. In this time I have gained extensive knowledge in the interpretation of lands records and cadastral parcel mapping.

2. At the request of the U.S. Attorney's Office for the District of Montana, I oversaw the preparation of the attached map. The purpose of this map is to show the National Forest boundaries in the area surrounding the Plaintiff's property. The National Forest boundaries shown on this map are from the LSRS GIS database, which is the authoritative source of National Forest boundary data for the U.S. Forest Service.
3. The map also accurately identifies the general location of the following properties:
  - a. Plaintiff's property as identified in its Complaint (Doc. 1 at ¶ 4);
  - b. Government Lot 5 of Section 24, Township 26N, Range 33W, Montana, as identified in *Avista Corp Inc. v. Wolfe*, 549 F.3d 1239, 1243 (9th Cir. 2008);
  - c. Government Lots 8 & 9 of Section 19, Township 26N, Range 32W, Montana, as identified in the Complaint filed in *Noxon Rural Fire District v. Evans*, No. 96-06 (Sanders County, Mont. Nov. 12, 1996);
  - d. NE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 30, Township, 26N, Range 32W, Montana, as identified in the Complaint filed in *Olson v. County of Sanders*, et al., No. DV-85-37 (Sanders Co., Mont. Oct. 13, 1987);
  - e. SE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 12, Township 24N, Range 32W and NE $\frac{1}{4}$ SW $\frac{1}{4}$  of Section 12, Township 24N, Range 32W, Montana, as identified in the Complaint in *Bennett v. United States*, et al., No. 6262 (Sanders Co., MT. Nov 25, 1980));
  - f. SW $\frac{1}{4}$  of Section 1, Township 23N, Range 31W and N $\frac{1}{2}$  of Section 12, Township 23N, Range 31W, as identified in the Complaint in *Wooden v. United States*, et al., No. DV-99-94 (Sanders Co., Mont. July 13, 1999).

I declare under penalty of perjury that the foregoing to be true and correct.

Executed on this 25<sup>th</sup> day of February, 2019 in Missoula, Montana.



Will Pedde